REMARKS/ARGUMENTS

Claims 5-9 are pending in this application, with claims 5 and 6 being independent. Claim 5 has been withdrawn from consideration. Former dependent claim 7 has been re-drafted as independent claim 10, with the limitations of claim 6 (from which claim 7 depended) incorporated therein.

In the pending Action, the Examiner objected to claims 6 and 7 for various informalities, and rejected claims 6 and 9 under 35 U.S.C. § 103(a) as allegedly obvious in light of United States Patent No. 5,569,879 (Gloton, *et al.*). The Examiner indicated that claims 7 and 8 presented allowable subject matter if the formal objections to claim 7 were corrected and claims 7 and 8 were re-written so that they no longer depended from a rejected base independent claim.

By the amendment above, the applicants have re-presented former claim 7 as new independent claim 10, containing the limitations of claim 6 (the base independent claim from which claim 7 depended), while addressing the formal objections raised by the Examiner to claims 6 and 7. Accordingly, it is respectfully submitted that new claim 10 presents allowable subject matter and is in allowable form. Former claim 8 has been re-presented as new claim 11, depending from allowable claim 10, and so it, too, is believed to present allowable subject matter and be in allowable form. Thus, early and favorable action regarding claims 10 and 11 is respectfully solicited.

Turning to the obviousness rejection of claims 6 and 9, the applicant has carefully considered the Examiner's rejection and the comments provided in support thereof, but respectfully disagrees with the Examiner's conclusions as to the teachings of Gloton, *et al.*, and

so respectfully traverses this rejection. The applicants have amended claim 6 to remove the informality noted by the Examiner, and therefore claim 6 is allowable as amended.

The invention as claimed in claim 6 is an integrated circuit card having a conductive track and an insulating layer. The conductive track has a plurality of perforations in which portions of the insulating layer are received, to improve the bond between the conductive track and the insulating layer. In this fashion, the conductive track and the insulating layer are more securely held together to resist stresses which might otherwise tend to separate them.

Gloton, *et al.*, however, teach an integrated circuit micromodule in which a perforated *insulating layer* (dielectric strip 11 having perforations P1, P5) is bonded to a metal strip 10 having slots 102 (*see* Fig. 6). A chip 100 is mounted on the top of dielectric strip 11 and connected to metal strip 10 by conductors 103 which pass through the perforations in dielectric strip 11. Gloton, *et al.* therefore fail to teach bonding of an insulating layer and a conductive track where the bonding is provided by perforations in the *conductive track* in which portions of the *insulating layer* may be received.

The Examiner contends that:

"Gloton discloses a micromodule having an insulating layer (a metal strip 100; and

"a conductive track (i.e. a dielectric strip 11) disposed on the insulating layer 10. . .".

Thus, the Examiner characterizes metal strip 10 as being an insulator, and dielectric strip 11 as being a conductive track. It is respectfully submitted that both characterizations are wrong.

Col. 3, lines 26-35 of Gloton, *et al.* describe metal strip 10 as being "formed by a strip of copper. . . slotted with a repetitive pattern of slots 102 which. . . define the separate contacts 3. . .". Col. 3, line 54 refers to "conductive zones 3". It is clear and indisputable that

metal strip 10 cannot possibly be considered to be "an insulator", contrary to the Examiner's characterization. If the Examiner disagrees, and continues to believe that metal strip 10 can be characterized as an insulator, then she is respectfully requested to provide support for that view.

Likewise, strip 11 is understood by the Examiner as being made of a dielectric. How, then, can the Examiner characterize it as a conductive track? In fact, it is not.

Based on the above-discussed erroneous characterizations, the Examiner further contends that "the conductive track has a plurality of perforations. . .". However, metal strip 10 has slots, not perforations. The only perforations disclosed in Gloton, *et al.* are in the insulator, i.e. the dielectric strip 11, not in what can be fairly considered the conductive track.

The Examiner has taken the further position "that [the] hot bonding operation of the two layers/strips [in Gloton, *et al.*] clearly provides the insulating layer into the perforations so that the two layers/strips would cohere to each other." However, even if the above-discussed mischaracterizations by the Examiner are ignored, this allegation is not supported by the actual teachings and drawings of Gloton, *et al.*, which show that there is *no* such co-operation between the two layers/strips (*see* Fig. 4). Given that the *actual* teachings of Gloton, *et al.* show the passage of conductors through perforations P1, P5, with no crossing over of either the metal strip 10 or dielectric strip 11 into the other, it is respectfully submitted that Gloton, *et al.* do not fairly teach or suggest the bonding of dielectric layer 11 and metal strip 10 by receiving any portion of dielectric layer 11 in any portion of metal strip 10 as specifically claimed in claim 6. Moreover, considering the fact that metal strip 10 is a metal, not an insulator, the hot bonding will not cause metal to flow into the perforations in dielectric layer 11 because the required temperature to accomplish that would damage the device and, therefore, is well above hot bonding temperatures.

To summarize, the Examiner's characterization of elements 10 and 11 in Gloton, *et al.* is clearly wrong, and this mischaracterization is at the root of the rejection which, consequently, must be reconsidered and withdrawn. Accordingly, claim 6 is allowable.

Claim 9 depends from claim 6, and is therefore also allowable.

For these reasons, and there being no further grounds for objection or rejection, it is respectfully submitted that the invention as claimed is neither taught nor suggested by Gloton, *et al.* Withdrawal of the pending rejection and allowance of the present application are appropriate.

Early and favorable action is therefore respectfully solicited.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,

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